

T. Edward Williams

From: T. Edward Williams
Sent: Thursday, June 4, 2020 10:34 PM
To: John Harwick
Cc: Ben Neidl
Subject: RE: Conferring on Nondispositive Motion

John:

I cannot do 1:00 but I can do 2:10. I have a Webex Hearing that (should end at 2:00). Would that time work for you guys?

Regards,

T. Edward Williams, Esq., Partner
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From: John Harwick <jharwick@joneshacker.com>
Sent: Thursday, June 4, 2020 8:04 PM
To: T. Edward Williams <edward.williams@wmsintl.com>
Cc: Ben Neidl <bneidl@joneshacker.com>
Subject: Re: Conferring on Nondispositive Motion

Please set up a phone call before 1 o'clock tomorrow to confer. I would like to have Ben also on the call.

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On Jun 4, 2020, at 7:41 PM, T. Edward Williams <edward.williams@wmsintl.com> wrote:

Counsel:

I am conferring on the two motions. The first will be made under Rule 26(d) of the Federal Rules of Civil Procedure. Plaintiffs are seeking early discovery to prevent the continue loss of their property.

Second, I am conferring on a motion to disgorge all funds paid to your law firm dating back to 2018. Those funds have all been stolen funds since your client has not had any other income than monies stolen from my clients and others.

Please let me know if you oppose. If you wish to engage in further discussions, please let me know. I am aiming to have the motion filed by Monday. The starting point for the second motion is the US Supreme Court's decision in *Caplan & Drysdale v. United States*, 491 U.S. 617 (1989).

Regards,

T. Edward Williams, Esq., Partner

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